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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Isabel Irene Yanez,

Plaintiff,

v.

Doe Driver I, individual; United States of
America; DOES I – X, and ROE
Corporations I-X, Inclusive,

Defendants.

Case No. 2:24-cv-01494-EJY

**Stipulation to Extend United States'
Deadline to File Response to Plaintiff's
Complaint**

(First Request)

Plaintiff, Isabel Irene Yanez, through counsel and the United States of America, on behalf of Federal Defendants, through undersigned counsel, hereby agree and stipulate to extend the deadline to file a responsive pleading to Plaintiff's Complaint under the Federal Tort Claims Act by 18 days, until **November 8, 2024**. The parties enter into this stipulate based on the following:

1. Plaintiff filed the Complaint on August 14, 2024 (ECF No. 1).
2. Plaintiff served the United States with a copy of the Summons and Complaint on August 20, 2024.
3. The current deadline for the United States to respond to the Plaintiff's Complaint is October 21, 2024.

1 Plaintiff and the United States, through undersigned counsel, agree and stipulate
2 that the United States' time to respond to the Plaintiff's Complaint shall be extended to
3 November 8, 2024. This is the first request for an extension of time.

4 The extension of time is necessary for the United States' counsel to obtain and
5 review the relevant information relating to the alleged traffic incident from the United
6 States Postal Service to properly respond to the allegations in Plaintiff's complaint.

7 Therefore, the parties request that the Court extend the deadline for the United
8 States to file a responsive pleading to Plaintiff's Complaint to November 8, 2024.

9 This stipulated request is filed in good faith and not for the purpose of undue delay.

10 Respectfully submitted this 8th day of October 2024.

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12 ER INJURY ATTORNEYS

13 /s/ Justin G. Randall
14 JUSTIN G. RANDALL, ESQ.
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16 *Attorney for Plaintiff*

JASON M. FRIERSON
United States Attorney

/s/ Karissa D. Neff
KARISSA D. NEFF
Assistant United States Attorney

Attorneys for the United States

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18 **IT IS SO ORDERED:**

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21 **UNITED STATES MAGISTRATE JUDGE**

22 **DATED: October 8, 2024**
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